



PROGRESS REPORT NO. 67

TO: Helen Bottcher – U.S. Environmental Protection Agency (EPA) - via Email

FROM: Marko Adzic – Teck American Incorporated (TAI)

DATE: February 10, 2012

FILE NO: 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) - Progress Report No. 67 Month Ending January 2012

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of the activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

On January 5, 2012, TAI was instructed to produce a final *Expansion of the Problem Formulation Chapter of the UCR Baseline Ecological Risk Assessment Work Plan*. As clarified during the December 15th clarification meeting, the above-mentioned chapter included a laboratory-based bioaccumulation and associated benthic invertebrate tissue chemistry study. The inclusion of such a study was disputed by TAI under the basis that it was not consistent with EPA guidance, not based on principles of risk-based analysis, and was a material departure from the purpose and goals of the Statement of Work's tiered-approach as presented within the Agreement. With resolution of the dispute attained on February 3, 2012 the aforementioned chapter will be finalized and submitted for approval no later the March 12, 2012.

On the 20th of January, peer review comments as generated by EPA's Office of Research and Development (ORD) for 2010 white sturgeon toxicity studies were made available to principal investigators for their review. It is anticipated that following review of the comments/suggestions as received by ORD, close coordination and communication will be required by principal investigators, EPA, and TAI to ensure that formatting of draft reports are consistent and satisfy RI/FS needs. At the time of writing, definitive timelines for the submission of draft reports have not been determined. TAI will continue to work cooperatively with EPA in evaluating and determining reasonable and appropriate schedules for the submission of the aforementioned draft reports.

Revisions to the draft 2011 beach sediment sampling Cultural Resources Monitoring report are being made based on comments received from the Cultural Resources Working Group. A final report will be submitted in February 2012.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4585.